

REMARKS/ARGUMENTS

Favorable reconsideration of this application, as presently amended and in light of the following discussion, is respectfully requested.

Claims 17-74 are currently pending, claims 17-22, 26-28, 33, 46-51, 55-57, and 62 being amended by the present amendment. Applicant respectfully submits that support for these claim amendments is self-evident from Applicant's originally-filed disclosure, including the claims and drawings. As such, no new subject matter is introduced by these changes.

In the Office Action, claims 17-19, 22, 25-29, 31-40, 45-48, 51, 54-58, 60-69, and 74 were rejected under 35 U.S.C. § 102(e) as anticipated by Yamagami et al. (U.S. Patent No. 5,535,011; hereinafter "Yamagami"). Claims 30 and 59 were rejected under 35 U.S.C. § 103(e) as unpatentable over Yamagami. Claims 20-21 and 49-50 were rejected under 35 U.S.C. § 103(a) as unpatentable over Yamagami in view of Silverbrook (U.S. Patent No. 5,430,496.) Claims 23-24 and 52-53 were rejected under 35 U.S.C. § 103(a) as unpatentable over Yamagami in view of Johnson (U.S. Patent No. 5,8099,068.) Claims 41, 42, and 70-71 were rejected under 35 U.S.C. § 103(a) as unpatentable over Yamagami in view of Sasaki et al. (U.S. Patent No. 5,018,017; hereinafter "Sasaki".) Claims 43, 44, 72, and 73 were rejected under 35 U.S.C. § 103(a) as unpatentable over Yamagami in view of Crawford (U.S. Patent No. 5,771,354.)

Applicant respectfully submits that Yamagami fails to anticipate the pending independent claims, as amended by the foregoing amendment. For example, amended claim 17 recites a digital image capturing device that includes, among other features, a second input/output interface connected to the processor and configured to receive a card that operates in accordance with a control program, and a memory which receives the control program from a source outside of the digital image capturing device. Referring to the non-limiting example shown in Applicant's Figure 2, a camera 30 includes a first card connector

17A that is configured to receive an I/O card 15. The I/O card 15 operates in accordance with a control program that is received by a CPU 23 of the camera 30 from, for example, the I/O card 15 or a memory card 16, both of which are sources outside of the camera 30.¹ In this way, a camera according to an aspect of the present invention:

...can perform communication through any type of electronic communication medium using any type of electronic communication protocol, as long as the proper program exists in the I/O card...the camera itself can be made inexpensively as it does not need to have programmed therein when initially purchased every I/O protocol...further, as new protocols are developed, they can be easily used by the camera simply by plugging in a new card containing the corresponding I/O interface program.²

Yamagami does not teach and every feature of amended claim 17. Yamagami depicts a camera including an extended interface 110 that can be coupled to an extended card 111, which is arranged to process captured images before transmitting them to a host computer 112.³ The extended card 111 of Yamagami is arranged to communicate with the extended interface 110 according to a particular protocol, such as SCSI, and the extended interface 110 must also be compatible with the same protocol. However, the extended card 111 does not operate in accordance with a control program that is received by a memory of a digital image capturing device from a source outside of the digital image capturing device. Also, Yamagami includes no disclosure of a memory of a digital image capturing device that receives a control program for operating a card from a source outside of the digital image capturing device. Rather, in the system depicted by Yamagami, the communication protocol between the extended interface 110 and the extender card 111 is predetermined (e.g., the SCSI protocol) such that there would be no need to receive a control program for operating a card from a source outside of a digital image capturing device.

¹ See Applicant's specification at Figures 2, 6, and 7; and at page 7, lines 11-13, and from page 14, line 25, to page 15, line 3.

² Applicant's specification from page 3, line 20, to page 4, line 2.

³ See Yamagami at Figures 1 and 2; and at column 4, lines 2 through 32.

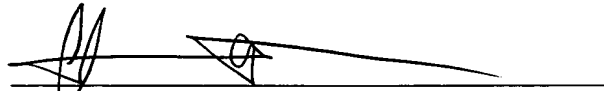
For at least these reasons, Yamagami does not teach each and every feature of amended claim 17 and therefore fails to anticipate amended claim 17. Accordingly, Applicant respectfully requests reconsideration and withdrawal of the rejection of claim 17 under 35 U.S.C. § 102(e). Further, there is no suggestion in the prior art to modify the teachings of Yamagami to arrive at the features of amended claim 17 and therefore it is respectfully submitted that the prior art also fails to render obvious the present invention. For example, as discussed above, the system of Yamagami actually teaches away from the feature of a memory of a digital image capturing device configured to receive a control program for operating a card from a source outside of the digital image capturing device, as the communication protocol between the extended interface 110 and the extended card 111 is predetermined. Moreover, claims 18-45 depend from independent claim 17 and patentably define over the art of record for at least the reasons discussed above.

Amended claim 46 recites, among other features, "a second input/output interface means, connected to the processor, for interfacing to the digital image capturing device and for receiving a card means for operating in accordance with a control program; and memory means for receiving the control program from a source outside of the digital image capturing device and for storing the control program." For reasons similar to those discussed above with respect to amended claim 17, Applicant also respectfully submits that amended claim 46 patentably defined over Yamagami. Accordingly, Applicant respectfully request reconsideration and withdrawal of the rejection of claim 46 under 35 U.S.C. § 102(e). Further, claims 47-74 depend from independent claim 46 and are allowable for at least the reasons discussed above.

Consequently, in light of the above discussion and in view of the present amendment, the present application is believed to be in condition for allowance and an early and favorable action to that effect is respectfully requested.

Respectfully submitted,

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A handwritten signature in black ink, appearing to read 'James J. Kulbaski', is written over a horizontal line.

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